

portability, however, there is no justification for forcing incumbent LECs to make such a large, short-term investment that will have no continuing utility.³⁴

Nor are such modifications likely to be necessary to allow the Commission's overarching principle to be recognized in practice. In GTE's experience, incumbent LECs and new entrants have been able to agree on mutually acceptable methods for sharing terminating access charges. These methods include issuing bills based on traffic samples and entering settlement arrangements based on total access charges per line.³⁵

If carriers cannot agree on appropriate meet-point billing arrangements, they should be free to request mediation or arbitration from the state PUC, informal assistance from the Commission's staff, or other forms of alternative dispute resolution. Modifications to billing systems should not be required, because such inefficient investments will only divert resources from implementation of long-term

³⁴ *Compare First Report and Order* ¶ 116 (rejecting a medium-term data base solution because it would impose needless expense and possibly delay a long-term approach).

³⁵ Recently GTE has entered into agreements with several CLECs that provide for the sharing of terminating access charges without extensive modifications to its billing systems and switch software. As an example, GTE and Time Warner have agreed in Ohio to an arrangement whereby GTE provides Remote Call Forwarding to Time Warner in exchange for the access revenues associated with the ported number. Under the GTE - MFS agreement in Texas, MFS pays for Remote Call Forwarding and GTE credits MFS for an amount equal to the average terminating access charges per line in the specific end office for each of MFS's forwarded lines in that office.

number portability. Accordingly, the Commission should clarify that forwarding carriers do not have to pass call detail on every forwarded interexchange call.

IV. THE COMMISSION SHOULD ESTABLISH TARGETS RATHER THAN DEADLINES FOR CMRS IMPLEMENTATION OF NUMBER PORTABILITY.

GTE agrees with the Commission's assessment that number portability will promote competition between CMRS and wireline providers.³⁶ It is concerned, however, with meeting the required implementation dates of December 31, 1998 for being able to query portability data bases in order to deliver calls to ported numbers, and June 30, 1999 for offering service provider portability throughout its network, including the ability to support roaming.³⁷ The Commission itself acknowledged that the CMRS industry is far behind the wireline industry in addressing the standards, protocols, and technical requirements to implement number portability. In addition, as the Commission pointed out, initial state efforts dealing with number portability have generally not addressed CMRS issues.³⁸

The Commission must also recognize that implementing number portability in wireless networks poses unique problems over and above those faced by the wireline industry. These unique issues include:

³⁶ *First Report and Order* ¶ 160.

³⁷ *Id.* ¶¶ 165, 166.

³⁸ *Id.* ¶ 164.

- 1) The wireless industry has yet to analyze the impact of number portability implementation. However, the wireline industry has addressed number portability issues since 1994.
- 2) The wireless network is much less advanced in networking capability than wireline networks. (AIN, SS7 infrastructure, etc.)
- 3) The impact of number portability on seamless roaming service can be significant.
- 4) Wireless implementation of number portability-capable SS7 networks are needed. A very small portion of wireless networks have SS7 currently deployed.
- 5) Redesign of network protocols (roaming, call routing, database queries, etc.)
- 6) Redesign of wireless support systems such as:
 - Service provisioning systems (for new customers)
 - Customer care systems
 - Roaming systems
 - Roaming agreements
 - Fraud systems
 - Billing systems
 - HLRs and VLRs

Set forth below is a list of steps that must be taken in order to successfully implement wireless number portability:

- 1) Industry and/or service providers to determine what solutions are available in what time frame -- from number portability vendors covering wireless unique issues including support systems modifications:
 - Industry RFI to number portability vendors (being prepared)
 - Review and analyze proposed NP solutions and NP impacts on existing wireless architecture and network services such as roaming
 - Determine most effective approach
 - Establish implementation time frames with vendors

- 2) Establish wireless industry number portability standards including support systems standards and obtain industry agreement and approval
- 3) Individual service providers to negotiate network specific number portability solutions (consistent with wireless NP standards) with qualified vendors and execute contracts.
- 4) Implementation of number portability through ALPHA, BETA and final testing phases to ensure integrity of wireless networks when placing number portability into service.

Currently, the wireless industry is planning to implement International Mobile Station Identity ("IMSI") for international roaming.³⁹ The wireless industry is investigating the use of IMSI in support of wireless number portability. In a number portability environment, the Mobile Identification Number ("MIN") will require new network capabilities to support roaming while IMSI may allow the network to continue using existing capabilities.⁴⁰ This may mitigate implementing requirements that are not needed when IMSI is deployed. The FCC should give the wireless industry an opportunity to assess the implication of using IMSI and interworking IMSI with number portability.

While GTE is optimistic that these issues will be resolved, it is concerned that the required deadlines may be difficult or perhaps impossible to meet, and that attempting to resolve these issues expeditiously may adversely affect the integrity

³⁹ The usage of "IMSI" here refers to the format of MCC + MNC + MSIN, also known as full IMSI or pure IMSI. In contrast, pseudo-IMSI is MIN-based.

⁴⁰ The function of IMSI is for mobile station identification only unlike the MIN, which serves as both the mobile station identity and directory number.

of wireless networks. GTE recognizes, of course, that the Commission allows for the possibility of individual waivers and stays of the deadlines.⁴¹ Nonetheless, rushed implementation by some wireless companies to implement number portability based on those deadlines may adversely affect the reliability of wireless networks -- particularly existing networks, which have significantly more changes to make than newly developing networks. GTE is equally concerned that the Commission may be inclined not to stay the scheduled implementation dates, or not to waive the deadlines, based on an incorrect perception of completion with regard to these potentially rushed solutions. The Commission should accordingly recharacterize the implementation dates as targets rather than rigid deadlines, depending upon the outcome of the industry's effort to resolve its unique issues, and should allow CMRS providers to deploy number portability on a phased-in basis, as it does for landline LECs, to help ensure that network integrity is maintained.

V. CONCLUSION

GTE respectfully urges the Commission to clarify and modify the *First Report and Order* as discussed above and in the Pacific Telesis QOR Petition. Such

⁴¹ *Id.* ¶ 167.

modifications will help assure that INP and long-term portability are implemented in a manner that provides the greatest benefit to consumers.


Respectfully submitted,

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